

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUE ZHANG,
Plaintiff,

v.

SHRAGA N. GOLDBERG, M.D.,
Defendants.

C.A. NO. 04-12735PBS

NOTICE OF TAKING DEPOSITION

TO: Barry D. Lang, Esquire
Barry D. Lang, M.D. & Associates
One State Street, Suite 1050
Boston, MA 02109

Please take notice that at **12:00 p.m. on November 16, 2006**, at the offices of **ADLER, COHEN, HARVEY WAKEMAN & GUEKGUEZIAN, LLP, 75 Federal Street, Boston, Massachusetts**, the defendant in this action, by his attorneys, will take the deposition upon oral examination of **Cameron Ashbaugh, M.D.**, pursuant to the applicable provisions of the Massachusetts Rules of Civil Procedure, before a Notary Public in and for the Commonwealth of Massachusetts, or before some other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

You are invited to attend and cross-examine.

*** You are required to bring with you those documents requested on the attached Schedule A.**

The Defendant,
SHRAGA N. GOLDBERG, M.D.,
By his attorney,

Sidney W. Adler, BBO #012660
Jennifer Boyd Herlihy, BBO #636815
Adler, Cohen, Harvey, Wakeman
& Guekguezian, LLP
75 Federal Street, 10th Floor
Boston, MA 02110
(617) 423-6674

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each other
party by (hand) (mail) on 11/2/06

Schedule A

1. Documents provided to you by plaintiff's attorney to assist you in formulating your opinions and conclusions in this matter.
2. Any and all reference materials utilized in formulating said conclusions and opinions.
3. All literature, standards, rules and regulations used in arriving at your conclusions and opinions.
4. Any and all other materials, documents, reports, notes, correspondence, and all material of any kind or nature whatsoever contained in any file you have or maintained at your place of business or home with regard to the above-captioned matter.
5. All correspondence between you and plaintiff's attorney.
6. All notes and/or notation resulting from any conversations involving facts or circumstances that relate to your conclusions and opinions in this case.
7. All notes and/or notation resulting from any meeting or examination of the plaintiff or any fact witnesses in this case.
8. Any written agreements relating to your retention as an expert in this case.
9. All records and/or documents associated with the case.
10. All billing records for time spent working on this case, and invoices for same.
11. Any and all schedules or documents regarding income from expert services provided within the last five (5) years, including but not limited to tax returns.